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March 27, 2000

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EXECUTIVE
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David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

**In Re: Complaint of Discount Communications against BellSouth
Telecommunications
Docket No. 00-00230**

Dear David:

As of yesterday, I have been retained to represent Discount Communications which has a pending complaint against BellSouth Telecommunications, TRA, Docket 00-230. I have been told that the case will be on the March 28 conference agenda for the purpose of appointing an administrative judge to hear Discount's complaint.

The purpose of this letter is, first, to enter my appearance on behalf of Discount and, second, to ask that if a administrative judge is appointed, one be named tomorrow so that Discount Communications can immediately seek interim relief.

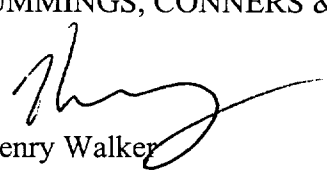
As a result of the above-captioned dispute between the parties, BellSouth has threatened to terminate service to Discount Communications, a reseller, and has already denied the company access to BellSouth's LENS system, effectively crippling Discount's ability to remain in business. (See attached Affidavit)

Therefore, I request that, if an Administrative Judge is appointed, that he be named at, or shortly after, the TRA's public meeting tomorrow, so that Discount may request interim relief pending the outcome of a hearing on Discount's complaint.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Henry Walker

HW/nl

c: Guy Hicks, counsel for BellSouth Telecommunications

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BEFORE THE TENNESSEE PUBLIC SERVICE COMMISSION

NASHVILLE, TENNESSEE

In Re: Complaint of Discount Communications Against BellSouth
Telecommunications
Docket No. 00-00230

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AFFIDAVIT OF EDWARD HAYES

Comes now Affiant, Edward Hayes, and states and deposes as follows:

1. My name is Edward Hayes, and I am the President of Discount Communications.

2. On February 22, 2000 (thirty-five days ago) BellSouth shutoff Discount Communications access to its LENS ordering system. According to Mr. Claude Morton and Attorney Patrick Turner of BellSouth (03-15-00), Discount Communications; access to BellSouth's LENS system was discontinued because Mr. Eddie Roberson of the Tennessee Regulatory Authority, orally informed the aforementioned representatives of BellSouth that Discount Communications' complaint filed with the TRA had been resolved in BellSouth's favor.

3. As a result of BellSouth's denial of access to the LENS System, Discount Communications has been crippled, paralyzed, cannot maintain, run or build its business, and is presently losing one hundred and seventy-five thousand dollars (\$175,000.00 per month, and at least five hundred (500) potential new customers per month.

4. BellSouth's LENS System is the backbone of Discount Communications operating system. The LENS System allows Discount Communications to: (A) place orders; (B) verify orders; (C) amend/correct orders, i.e., add features; (D) suspend/disconnect non-paying

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customers; (E) examine local service records - orders Discount Communications places with BellSouth; (F) examine customer service records; and (G) transfer existing customers.

5. Without the LENS System, Discount Communications cannot add new customers, cannot service existing customers, cannot edit, modify, alter or change orders that have been placed. Without the LENS System, when a customer moves, Discount Communications cannot disconnect and reconnect a customer - that customer is lost. Without the LENS System, temporarily disconnected service cannot be restored or totally disconnected - Discount Communications is still billed for that customer although Discount Communications is not receiving any money from the customer. Without the LENS System, a customer's service record cannot be verified. If a customer wants to add or delete a feature, Discount Communications cannot fulfill the service request without the LENS System. Without the LENS System, Discount Communications cannot compare their orders against BellSouth's billings.

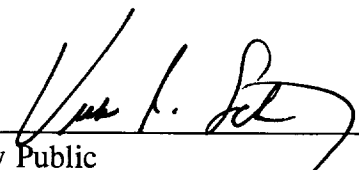
FURTHER THE AFFIANT SAYETH NOT.


Edward Hayes

STATE OF TENNESSEE

COUNTY OF DAVIDSON

Sworn to and subscribed before me this 27th day of March, 2000.


Notary Public

My Commission Expires: 7-31-2001